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January 3, 2024

BY ECF

The Honorable Richard M. Gergel
United States District Court
For the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: *Tyco Fire Products LP v. AIU Ins. Co., et al., No. 2:23-cv-02384*
(D.S.C.)

Dear Judge Gergel:

We are counsel to the Partial AIG Insurers in the above-captioned action. We write in response to Plaintiff's letter to the Court dated January 2, 2024 (Doc. No. 203) requesting to expedite its discovery motion (Doc. No. 202) such that the Partial AIG Insurers would need to respond by January 9, 2024 (one week instead of two).

Plaintiff and the Partial AIG Insurers will be mediating on January 8, 2024, before Judge Phillips. Respectfully, given the significant time-consuming amount of work that needs to be done to prepare for the mediation, not to mention participating in the mediation itself, it is impossible to meaningfully respond to Plaintiff's lengthy discovery motion the day after the mediation. We respectfully request, therefore, that the Partial AIG Insurers be given until January 12, 2024, with the Plaintiffs reply to be due three days later as suggested in Tyco's letter.

Respectfully,

/s/ Adam J. Kaiser
ADAM J. KAISER

cc: All Counsel of Record (by ECF)